



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JRS/GK/DAS
F. #2021R00900

271 Cadman Plaza East
Brooklyn, New York 11201

January 17, 2024

By Email

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Counsel for Carlos Watson

Re: United States v. Carlos Watson and Ozy Media, Inc.
Criminal Docket No. 23-82 (EK)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes on the enclosed hard drive a production of discovery in the above-captioned case, which is Bates-numbered USAO-EDNYOZY000000244 to USAO-EDNYOZY000000252. A password to the drive and an index detailing the records in the production, which is Bates-numbered USAO-EDNYOZY000000253, will be provided by email.

Please note that the extractions of iPhone and iCloud information being produced herein are largely duplicative of records that the government previously provided to the defendants. The materials produced under Bates numbers EDNYOZY000000244 and USAO-EDNYOZY000000245 largely overlap with records that were previously produced under Bates numbers EDNYOZY000494177 through EDNYOZY000494235; the materials produced under Bates number USAO-EDNYOZY000000246 largely overlap with records that were previously produced under Bates numbers EDNYOZY000437597, EDNYOZY000437598, EDNYOZY000438189 and EDNYOZY000438190; and the materials produced under Bates number USAO-EDNYOZY000000248 largely overlap with records that were previously produced under Bates number FILTER-EDNYOZY001899395.

This discovery is being provided to you pursuant to the protective order entered by the Court on April 21, 2023, which was later signed by Mr. Sullivan on May 24, 2023. See ECF Dkt. No. 54.

The government renews its request for reciprocal discovery from the defendants. Please note that the defendants' obligations under Fed. R. Crim. P. 16(b) include identification of "all non-impeachment exhibits [the defendants] intend to use in their defense at trial, whether the exhibits will be introduced through a government witness or a witness called by a Defendant." United States v. Napout, No. 15-CR-252 (PKC), 2017 WL 6375729, at *7 (E.D.N.Y. Dec. 12, 2017); accord United States v. Smothers, No. 20-CR-213 (KAM), 2023 WL 348870, at *22 (E.D.N.Y. Jan. 20, 2023).

If you have any questions or requests regarding further discovery, please do not hesitate to contact us.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/
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Enclosure

cc: Clerk of the Court (EK) (by ECF) (without enclosures)